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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Promote
Consistency in Methodology and Input
Assumptions in Commission Applications of
Short-run and Long-run Avoided Costs,
Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025

**JOINT PETITION OF PACIFIC GAS AND ELECTRIC COMPANY, SAN
DIEGO GAS & ELECTRIC COMPANY, AND SOUTHERN
CALIFORNIA EDISON COMPANY FOR MODIFICATION OF
DECISION 06-06-063**

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Dated: May 31, 2007

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EDISON COMPANY FOR MODIFICATION OF DECISION 06-06-063**

Pursuant to Commission Rule of Practice and Procedure 16.4, Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SDG&E") (together "Joint Utilities") submit this petition for modification of Decision (D.) 06-06-063. The Joint Utilities request that D.06-06-063 be modified to correct the potential for double counting costs in the Standard Practice Manual ("SPM") Total Resource Cost test ("TRC") as a result of ordering certain costs to be included in the administrative cost component of the TRC.

The Joint Utilities request the Commission issue an order changing the last sentence of Ordering Paragraph (OP) 15, D.06-06-063 to read as follows:

In situations where a direct install program does not bill or collect from the customer for any portion of the costs, then all the costs except those attributable to free-riders should appear as program administrator costs in both the PAC and TRC tests, and the participant cost should be zero

The Joint Utilities further request a Commission order adding a new sentence to OP 15 and changing the fifth sentence of OP 15 to read as set forth below:

. . . If the incentive is to offset a specific participant cost, as in a midstream/upstream or direct install type incentive, the full customer cost must be included in the TRC test as a participant cost, excluding costs attributable to free-riders. When dollar benefits do not go directly to the participating customer, the

participant cost must be reduced by the incentive attributable to offsetting or paying for the participant cost . . .

I. BACKGROUND.

On December 21, 2006, Administrative Law Judge Gottstein issued “Administrative Law Judge’s Ruling Addressing Compliance Filings Pursuant to Decision 06-06-063” (“ALJ Ruling”) in R.06-04-10. The ALJ Ruling provided direction for implementing TRC test calculations using a new tool, the E3 calculator. TRC test costs fall into two main categories: administrative costs and participant costs, with transfer payments for participants excluded from the calculation. The ALJ Ruling disagreed with the utilities’ treatment of midstream/upstream payments as transfer payments in the E3 calculator TRC test. The ALJ Ruling also rejected PG&E’s treatment of direct install costs as participant costs in the E3 calculator TRC test. As support for its position on midstream/upstream and direct install costs, the ALJ Ruling cited D.06-06-063, OP 15.

In response, the Joint Utilities wrote to the ALJ on March 16, 2007 about the problems created by the ALJ Ruling for midstream/upstream incentives, direct install strategies, and the related net-to-gross/free-rider issue. (Copy attached.) With respect to direct install costs, the Joint Utilities indicated they would file a petition to modify D.06-06-063’s treatment of direct install costs. This Petition to Modify requests the modification to D.06-06-063 identified in the Joint Utilities’ letter and comes within one year of the effective date of D.06-06-063, as required under the Rule 16.4(d).

II. ISSUE PRESENTED.

PG&E, SCE and SDG&E started energy efficiency rebate programs in the 1970’s to offset the costs for customers who buy and install energy-efficient measures (“participants”). Twenty years later, PG&E, SCE and SDG&E’s strategies for delivering energy efficiency expanded to include paying third parties directly to provide energy efficiency services and measures to participants, rather than providing a cash rebate to the participant (“Direct Install”). PG&E, SCE and SDG&E also instituted strategies to lower the participants’ retail charges for energy efficient equipment by paying the retailers and manufacturers to lower their prices (“Midstream/Upstream”). These newer approaches saved the participant the trouble of paying the third party provider or retailer first and then waiting to receive a direct cash rebate weeks later.

A. Direct Install

Since the payments to third parties for Direct Install strategies cover costs for energy-efficient measures the participant receives, the Direct Install costs approximate the participant's cost. For that reason, the Joint Utilities viewed Direct Install costs as the appropriate input for participant costs in the TRC formula. With this approach, the energy-efficient measure costs are captured once in the TRC formula. This treatment of costs for direct install programs continued when calculation of the TRC test shifted to the E3 calculator.

D.06-06-063 discusses treatment of Direct Install costs in the E3 calculator's TRC test at length. The decision finds fault with treating the Direct Install costs as participant costs in the TRC formula. Ordering Paragraph 15 summarizes the Commission's conclusion for Direct Install costs.

. . . In situations where a direct install program does not bill or collect from the customer for any portion of the costs, all the costs should appear as program administrator costs in both the PAC and TRC tests.

While requiring all the costs of Direct Install to appear as administrative costs in the TRC test, the Ordering Paragraph does not indicate whether the TRC calculations also should continue to include an additional value for participant costs, *plus* all the Direct Install costs as administrative costs. If the TRC administrative costs include the Direct Install costs *and* the participant costs do not decrease to reflect the participant's lower out-of-pocket costs, e.g., zero, Ordering Paragraph 15's implementation of the TRC test will cause the energy-efficient measure costs to be included twice.

Double counting the costs of the same energy-efficient measures, in the administrative costs and in the participant costs, will bias the Direct Install TRC test results below the correct level. The general formula for the TRC test makes that consequence apparent.

$$\text{Total Resource Cost}^{1/} = \frac{\text{kWh savings} \times \text{avoided cost}}{\text{administrative costs} + \text{participant costs}}$$

^{1/} In this formula for an energy efficiency program TRC test, both "savings" and "participant costs" excludes savings and costs arising from the actions of "free-riders", or those who would have undertaken the efficiency improving action without the program.

To avoid double counting costs for the Direct Install TRC test, the Commission must modify D.06-06-063 to require reduction of the participant cost by the Direct Install costs when the latter are included in the TRC test administrative costs. This adjustment effectively would make the participant cost zero. The Commission should also clarify whether the costs now to be included as administrative cost include those costs attributable to free-riders (those who would have undertaken the energy efficiency measures and the corresponding costs even if there were no program.)

Alternatively, the Commission could modify D.06-06-063, to allow Direct Install costs to be the input for participant cost in the TRC test instead of including the Direct Install costs in the TRC administrative costs. If the Commission approves this approach, the net-to-gross multiplier should continue to apply to the Direct Install costs included in participant cost. This alternative would recognize that the TRC should be adjusted to exclude free-rider costs, consistent with the Commission's long-standing historical practice up through the 2004-2005 programs. The net-to-gross multiplier captures and excludes the estimated free-rider costs. The Joint Utilities think this approach is preferable. However, if the Commission does not agree, the Commission must at least change the last sentence of Ordering Paragraph 15 to read:

. . . In situations where a direct install program does not bill or collect from the customer for any portion of the costs, then all the costs except those attributable to free-riders should appear as program administrator costs in both the PAC and TRC tests, and the participant cost should be zero.

B. Midstream/Upstream Payments

The utility Midstream/Upstream strategies pay retailers and manufacturers to lower the retail price of energy-efficient measures, such as compact florescent lamps purchased at places like local hardware stores. For the Midstream/Upstream TRC test, however, the participant cost includes the full cost, which is often from the Database for Energy Efficiency Resources (DEER) developed by this Commission and the Energy Commission. Thus the participant cost element of the TRC test for Midstream/Upstream does not reflect the retail price reduction achieved through the utility program's payments to retailers and manufacturers.

In order to avoid double counting the costs, the Midstream/Upstream costs were treated as transfer payments excluded from the TRC test. Since the benefit of buying down the retail price of the energy-efficient equipment goes to the participant, treating the costs as transfer payments also is consistent with the principle of benefit provided to the participant reflected in the definition of “financial incentives” in the Commission’s Policy Rules, D.05-04-051, Attachment 3, Appendix B, page 4. The ALJ Ruling, however, specifically rejects transfer payment treatment and cites D.06-06-063, Ordering Paragraph 15 as limiting transfer payments to “only the dollar benefits such as rebates or rate incentives (monthly bill credits) to the participating customer” (sic) (ALJ Ruling, page 6).^{2/}

If Ordering Paragraph 15 makes Midstream/Upstream costs part of the administrative cost element of the TRC test without reducing the TRC participant cost by the amount of the retail price reduction attributable to the Midstream/Upstream payments, the TRC test will double count the costs of the energy-efficient measures involved. Review of the TRC test formula again illustrates that the ALJ Ruling’s application of Ordering Paragraph 15 to Midstream/Upstream strategies causes the costs to be counted in both elements of the formula’s denominator:

$$\text{Total Resource Cost} = \frac{\text{kWh savings} \times \text{avoided cost}}{\text{administrative costs} + \text{participant costs}}$$

This double counting will distort the TRC test results for affected programs by significantly biasing the cost-effectiveness results downward. In order to correct this situation, the Commission needs to modify Ordering Paragraph 15 to indicate unequivocally that costs are

^{2/} The quote in the ALJ Ruling from D.06-06-063, Ordering Paragraph 15 contains an error. The portion of the Ordering Paragraph quoted reads:

“ . . . As discussed in this decision, all participant and non-participant costs shall be fully reflected in the TRC test with the limited exception of dollar benefits such as rebates or rate incentives (monthly bill credits) to the participating customer. Those dollar benefits shall be treated as a transfer payment and excluded on both the benefit and cost side of the TRC equation, as currently directed under the SPM. However, they will be included in the Program Administrator Cost (PAC) test. If the incentive is to offset a specific participant cost, as in a rebate-type incentive, the full customer cost (before the rebate) must be included in the TRC test as a participant cost . . . ”

not to be double counted. The Commission should also clarify whether the costs to now be included as administrative cost include those costs attributable to free-riders.

Alternatively, the Commission could modify the Ordering Paragraph to allow transfer payment treatment for programs that include the Midstream/Upstream and the Direct Install strategies, while including the full cost of the energy-efficient measure in the participant cost element. This approach would allow the net-to-gross multiplier to apply to the Midstream/Upstream costs. In this way, the Commission could recognize that the costs for free-riders in these programs should not be included in the TRC cost-effectiveness calculation.

At a minimum, however, Ordering Paragraph 15 should be modified to read:

. . . As discussed in this decision, all participant and non-participant costs shall be fully reflected in the TRC test with the limited exception of dollar benefits such as rebates or rate incentives (monthly bill credits) to the participating customer. Those dollar benefits shall be treated as a transfer payment and excluded on both the benefit and cost side of the TRC equation as currently directed under the SPM. If the incentive is to offset a specific participant cost, as in a midstream/upstream or direct install type incentive, the full customer cost must be included in the TRC test as a participant cost, excluding costs attributable to free-riders. When dollar benefits do not go directly to the participating customer, the participant cost must be reduced by the incentive attributable to offsetting or paying for the participant cost . . . [Additional text provided for context.]

III. ADVERSE EFFECTS OF THE CURRENT STATUS OF ORDERING PARAGRAPH 25.

At the end of its lengthy discussion of direct installed costs, D.06-06-063 states “We emphasize that today’s discussion of the TRC and PAC tests of cost-effectiveness does not speak to the design of programs (or is intended to cap incentives in any manner).” The real impact of D.06-06-063’s treatment of Direct Install and Midstream/upstream costs, however, will be on new programs and their design. The Joint Utilities explained their concern in their March 16, 2007 letter, page 3:

The interpretation of the TRC calculation described in the ruling will bias program choice against all programs which are not traditional utility operated customer rebate programs. This would work against all the effort over the last several years to seek the most cost effective and efficient delivery approaches including a broader base of program delivery.

If the current approach is applied to the estimation of energy efficiency potential, less technical potential will pass the TRC screen to become economic potential. Thus less economic potential would be part of the foundation for the Commission's goal setting, efficiency program planning and long-range energy procurement planning."

Whether intentional or inadvertent, Ordering Paragraph 15 and its implementation in the ALJ Ruling will discourage innovative, big, bold program design. Moreover, it will reduce the estimated potential energy efficiency under the TRC test.

IV. CONCLUSION

For the reasons discussed in this motion, the Joint Utilities petition the Commission to modify D.06-06-063, Ordering Paragraph 15, to ensure that the treatment of Direct Install program and Midstream/Upstream costs do not result in double counting of energy-efficient measure costs in both the TRC administrative cost and participant cost.

In order to provide the time and opportunity to find a better resolution of the problems raised by D.06-06-063 and the ALJ Ruling's treatment of Direct Install costs and Midstream/Upstream costs, the Joint Utilities also encourage the Commission to consider suspending Ordering Paragraph 15 of D.06-06-063 and the ALJ Ruling's treatment of these costs, while the Commission, its staff, and parties to the current energy efficiency rulemaking, R. 06-04-010.

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Respectfully Submitted,

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Dated: May 31, 2007

ATTACHMENT



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March 16, 2007

ALJ Gottstein
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ALJ Gottstein,

We are writing you in response to your December 21, 2006 Administrative Law Judge Ruling issued in R.06-04-010 addressing compliance filings pursuant to Decision 06-06-063 (Ruling) on the calculation of the total resource (TRC) cost test described in the "2001 California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects" (SPM). As a result of the Ruling, the TRC test no longer represents a comparison of the true economic benefits and costs of the portfolios. Specifically, we are concerned with three aspects of your ruling: (1) the treatment of midstream and upstream incentives; (2) the treatment of direct install costs; and (3) the treatment of costs caused by free riders. As described in more detail in the Attachment, the Ruling will reduce California's ability to realize energy efficiency's potential, reduce the effectiveness of major program delivery channels, and limit future innovation in measures and programs. Accordingly, we ask the Ruling be suspended as we plan the appropriate pleading to explicitly address these issues.

We believe that issues 1 and 3 result from a lack of clarity in the Standard Practice Manual (SPM), while issue 2 is a result of a recent Commission decision. We propose solutions for all three issues, and our proposals may require more formal action.

1. Midstream and Upstream Incentives

The Ruling directs the utilities to "remove midstream and upstream incentives from the Incentives-Rebate category." Midstream and upstream incentives provide a cost-effective means to reducing the cost of energy efficiency measures without the additional administrative cost of providing rebates directly to consumers. The Ruling in effect finds that these incentives provide no benefits to the purchasers of these reduced-cost measures, but only are administrative costs to the utilities. This is not an appropriate treatment of costs and will handicap a number of very successful programs, such as upstream motors and lighting. The reason given for this is that "Consistent with the SPM definitions, D.06-06-063 specifically directs that such incentives are restricted to include 'only the dollar benefits such as rebates or rate incentives (month bill credits) to the participating customers.'" This reading puts form over substance by excluding rebates to participating customers paid *through* midstream or upstream channels. For example, in order to obtain energy efficiency savings for lighting in the mass market, a utility can either give a Point of Sale rebate to individual customers or give an upstream

“buydown” to manufacturers or retailers. In either case, the end use customer pays a lower price for the same energy efficient lighting and thus obtains the same “dollar benefits” as “participating customers” regardless of which incentive method is used. However, the change in policy with regard to the treatment of upstream and midstream incentives as administrative costs misrepresents the true costs of these programs and inappropriately reduces the TRC results. The resulting reduction to the TRC of an upstream program motivates utilities to return to direct utility rebate programs, which are less cost effective than upstream programs because of higher administrative costs and lower market acceptance. This treatment of upstream incentives will prevent utilities from applying this more effective delivery approach to less cost-effective measures such as washing machines or dishwashers.

2. Direct Install Costs

The Ruling correctly notes that “Ordering Paragraph 17 of D.06-06-063 also requires the utilities to book direct install costs as ‘administrator costs’ in situations where a direct install program does not bill or collect from the customer for any portion of the costs for either the TRC or PAC tests of cost effectiveness.” This Ordering Paragraph also puts form over substance. If a direct installation implementer charges a customer for a direct install program and the customer then applies for a rebate for that program, the direct installation costs are accounted for as transfer payments and thus are not part of the TRC calculation. However, if utilities create more efficient programs by eliminating two transactions—the contractor charging the customer and the customer applying to the utility—and replace these with one—the utilities paying the contractor directly—the utilities are penalized with a lower TRC, even though the exact same services have been provided and benefits achieved. We plan to file a Petition to Modify D. 06-06-063 to modify this treatment.

3. Net to gross/free riders

The treatment of upstream incentive and direct install costs mandated by the Ruling requires some non-resource costs to be inappropriately included in the TRC calculation. The Ruling reads D.06-06-063 to require all customer payments for incremental measure costs to be included in the TRC. However, unless the net-to-gross ratio is 1.0, some of those payments would be made by “free riders”. If some customers are in fact “free riders,” which is what the net-to-gross ratio captures, their *payments are not incremental* and should not be included as costs in the TRC. The Ruling’s requirement to include free rider costs is a change from long-standing historical practice lasting through the Commission’s evaluation of programs in 2002-2003 and 2004-2005. Even if the Commission allows the newly included costs to be offset by a reduction to participant (or incremental measure) costs, the effect will still be to include the cost of free-riders as TRC costs¹. Examples are given in the Attachment.

¹ The December 21, 2006 Ruling and D. 06-06-063 direct the inclusion of certain costs, but do not address whether that creates a “double counting” situation or whether the included costs are to be offset by reductions in other costs previously included. Some argue that such cost offsets are appropriate, but the Commission has not spoken to the issue.

Impacts on programs and other considerations:

PG&E has performed a preliminary analysis that indicates that the TRC ratios for specific activities/programs comprising a large part of its portfolio will drop from 3% to 50% (see the Appendix to the Attachment). Programs facing reductions in TRC ratios include midstream/upstream energy efficiency programs that either buy down the retail point of sale price (e.g., compact fluorescent lights) or increase the availability of specific products (e.g., high efficiency motors). In addition, key programs will see their TRC ratios sink below 1. Among these are core mass market activities such as Refrigerant Charge and Airflow, Duct Test and Seal, and the direct install program element for Core Mass Markets.

The interpretation of the TRC calculation described in the ruling will bias program choice against all programs which are not traditional utility operated customer rebate programs. This would work against all the effort over the last several years to seek the most cost effective and efficient delivery approaches including a broader base of program delivery.

If the current approach is applied to the estimation of energy efficiency potential, less technical potential will pass the TRC screen to become economic potential. Thus less economic potential would be part of the foundation for the Commission's goal setting, efficiency program planning and long-range energy procurement planning.

The SPM has been interpreted differently on these same points by this Commission² and others. For example, the Province of Ontario in resuming energy efficiency programs produced a guide to TRC calculations starting with California's 2001 SPM. It explicitly excludes from the TRC rebate payments paid by the Local Distribution Company *or others* and free-rider's costs. See the Attachment.

As stated above, we propose that the Ruling should be suspended so that the Commission, its staff, the utilities, and other interested parties can investigate and definitively determine what the TRC test should measure and how the TRC test should be kept current with new developments in efficiency delivery channels and programs. In order to give the utilities and other program participants such as third parties and local government partnerships time to incorporate the results of this work into portfolio planning, the utilities should continue to use the TRC test in place prior to the ALJ Ruling for the 2006-2008 energy efficiency program cycle. This "older" TRC was the approach that all parties used in developing the programs that the Commission accepted for 2006-2008.

Implementing a new interpretation of the TRC test significantly changes the ground rules upon which the 2006-8 energy efficiency programs were based and approved by the Commission. Should the Commission decide to confirm the interpretation in D.06-06-063, then it should also explicitly assess whether its goals are still attainable based on achievable potential. In the alternative, any new method for implementing the TRC test should start with the program cycle beginning in 2009³.

² See the Attachment for the Commission's 1992 Decisions on the treatment of DSM Bidding program and incentive costs.

³ D. 06-06-063 was adopted nine months after the Commission approved the utilities 2006-2008 program proposals and funding applications in D. 05-09-043 and several weeks after the Commission accepted the last utilities Compliance Filing (PG&E's April 17, 2006 Compliance Filing was accepted on June 1, 2006).

We will raise the points contained in this letter in an appropriate pleading to bring these issues formally before the Commission and to give all parties an opportunity to formally comment. In the meantime, we appreciate your consideration of the issues described in this letter.

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Teresa Cho
Zenaida Tappan Conway
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PRG/PAG
Service List in R. 04-04-025
Service List in R. 06-04-010

Attachment

The Commission's Directive's On the Total Resource Cost Test Is A Barrier to Energy Efficiency

The Commission should be aware of the wide and adverse implications of the implementation of Decision (D.) 06-06-063 and the December 21, 2006 Administrative Law Judge Ruling (ALJ Ruling) on cost-effectiveness, especially on the calculation of the total resource cost test (TRC). This attachment presents the implications as described in the accompanying letter on Total Resource Cost methodology and closes with a suggested remedy.

The ALJ Ruling and recent Commission decision change long-standing policies regarding the calculation of cost-effectiveness in California and will have the effect of hindering the Commission's efforts to maximize energy efficiency as the first resource in the energy loading order for California. The effort to expand energy efficiency began with the Commission's adoption of "stretch" energy efficiency targets in 2004 and continued with its decisions on administration, rules and policy, and 2006-2008 programs. This framework raised the annual energy efficiency targets to more than twice the historical average, provided administrators with flexibility to achieve those targets, highlighted an essential role for non-administrator program delivery through a minimum funding requirement for non-utility program procurement, and encouraged administrator partnerships with local governments, state agencies, and other organizations.

The recent changes in the interpretation of the "California Standard Practice Manual: Economic Analysis Of Demand-Side Programs And Projects" (SPM)¹ changes the TRC from being a measure of the net resource value of energy efficiency programs for all customers into merely an indicator of the distribution of costs paid by ratepayers. This change misrepresents the costs incurred in the delivery of programs, and will have the effect of limiting the pursuit of new types of program implementation strategies in the

¹ The SPM is dated October 2001 and is posted on the Commission's Web site.

future. It works against the Commission's overall objectives for energy efficiency by increasing TRC costs for non-traditional programs, making fewer program activities cost-effective, and redefining the TRC.

1. The ALJ Ruling Changes the Treatment of Midstream and Upstream Incentives In The Total Resource Cost Test

The SPM was developed in the 1980s in order to provide a set of standard tests that enabled the consistent comparison of the effects of energy efficiency efforts. The recent changes in direction from D. 06-06-063 and the ALJ Ruling have altered the definitions of several of the inputs for these standard tests with the result that the TRC test no longer retains the same meaning that it has had for several decades. Instead of measuring the overall net resource costs of a program to all customers, which has been the traditional purpose of the TRC test, the ALJ Ruling introduces financial transfers into the TRC even though financial transfers do not necessarily reflect resource costs.

In part this result may have been caused by the definition of "Financial Incentives" and "Rebates" adopted in the Policy Rules². The definition of financial incentives used as examples rebates, low interest loans, and free technical advice as examples of financial support qualifying them as financial rebates. The definition of rebates in the Policy Rules specified that the participant had to be the recipient, but did not specify that the payer had to be the Program Administrator (PA). This allowed for the treatment of upstream and midstream rebates to be considered participant incentive and not included in the TRC. It was clarified in D. 06-06-63 (Decision) that for an incentive to be excluded from the TRC, the payer had to be the program administrator. As shown below, this contradicts previous Commission Decisions. Moreover, it was not until the 2006-2008 programs had all been approved that the current and historically narrow usage of incentive costs was put in place by the Decision.

In essence the Ruling is a result of a "catch 22": The SPM directs "all costs" to be included into the TRC (Decision, Ordering Paragraph 15), and rebates received by the participating customer are cost that are not to be included because they are transfers. But the rule or principle which determines whether a cost is a transfer is not made clear, or is

² D. 05-04-051, Attachment 3, Appendix B, page 4 and page 9 respectively.

contradicted in that a payment made to a vendor, and passed in full to a participant is to be included as a cost (Ruling, page 7). Yet economically, this is a transfer, just as the direct rebate payment is. So some transfers to participating customers are included, and some are not, on the conflicting principles that “all costs” are included, but certain transfers are not.

The Commission should consider if there is a consistent basis for including or excluding transactions from the TRC, based on the TRC’s function as an indicator of resource use which removes this inconsistency and elucidate it. The Commission and the SPM refer to but do not describe an “economic theory” which could be a guide as to which transactions are included as TRC costs and which are not, D. 06-06-063 may be logically inconsistent in its inclusion or exclusion of costs³. For example, if cash rebates paid directly to participants in a traditional rebate program are to be excluded from the TRC because the full resource costs are captured by the treatment of administrative and participant costs, wouldn’t the same logic apply to “upstream” rebates indirectly received by the customer? On the other hand, if upstream rebates are to be included as TRC costs because they represent actual costs to ratepayers, don’t rebates directly paid to participants also represent a cost to ratepayers? Without knowing the (economic) theory which makes these distinctions, these questions can’t logically be resolved. The Commission should clarify the basis for including or excluding transactions as costs in TRC calculations.

Under the Ruling, non-resource financial transfers are included in the TRC because the ALJ Ruling indicates that under Ordering Paragraph 15 of D.06-06-063 “incentives” should be limited strictly to amounts paid directly to customers and only in the form of cash. Any other payments (such as upstream/midstream payments to retailers

³ D. 06-06-063, p 66, attributes this approach to the 2001 SPM, “The only costs that are excluded in the TRC test are those “incentives” that are to be are considered and treated as transfer payments. The SPM specifically directs that such incentives are restricted to include “only dollar benefits such as rebates or rate incentive (monthly bill credits).”³ The conceptual basis for ignoring transfer payments in the development of the TRC is similar to the basis for ignoring tax credits in the societal version of the test. That is, when some taxpayers receive cash transfers (in the form of a tax credit) as a result of higher taxes paid by others, economic theory suggests that those transfers be excluded when calculating the costs and benefits of the investment from the societal perspective.” The Commission and the SPM are silent on the economic theory in question, and how it might be applied beyond the simple, two agent, PA-participant model used throughout the SPM.

that reduce the retail price to the consumer or direct installation programs which result in consumers receiving energy efficiency goods with the full cost paid by the program) must be included in administrative costs for the TRC formula. This has the effect of including as program administrator (PA) costs the financial value of transactions. These financial transactions do not represent true economic costs, i.e. the use or purchase of products or resources, but only the transfer of funds. This confuses and could introduce an inconsistency into the rationale for excluding from the TRC the rebates paid directly from a utility to a participant. It also opens the door for the inclusion of free-rider costs that society would incur regardless of the program.

Further Commission Clarification Would Ensure the Proper Treatment of Free Riders

A further consequence of including upstream or midstream rebates as PA costs is that some free-rider costs can remain included as TRC costs. This occurs even when the cost of such incentives are offset through a reduction of the participant's cost. Consider the following example:

PA administration costs:	\$100
PA payments to an upstream vendor to reduce participant cost:	\$1,500
Participant costs without upstream rebate:	\$3,000
Participant costs after upstream rebate:	\$1,500
Costs of comparable base efficiency measures:	\$1,000
Net-to-Gross ratio (NTG) (40% free-riders):	0.60
Gross benefits from the program:	\$5,000

Example1. Prior to D. 06-06-063,

TRC benefits of the program: $(.6) * \$5,000 = \$3,000$

TRC costs are: $\$100 + (.6)*(\$3,000-\$1,000) = \$1,300$

TRC net benefits are $\$3,000 - \$1,300 = \$1,700$

TRC ratio is 2.31.

The calculation excludes free-rider costs: $(1-.6)*(\$3,000-\$1,000) = \$800$.

These free-rider costs were properly not included because society would have incurred these costs with or without the program.

According to the Decision the \$1,500 paid as upstream rebate is now included as a PA cost. There are two possible calculation options: with and without a cost offset. These options arise because the Decision and Ruling are silent on the question of whether the included costs can or should reduce or offset participant costs now included in the TRC.

Example 2a. Option A - No cost offset – simply include the costs:

TRC benefits remain: $(.6) * \$5,000 = \$3,000$

TRC costs are now: $[\$100 + \$1,500] + (.6)*(\$3,000 - \$1,000) = \$2,800$

TRC net benefit becomes: $\$3,000 - \$2,800 = \$200$

TRC ratio changes to: 1.07

Example 2b. Option B – Participant cost offset in the amount of the upstream rebate

TRC benefits remain: $(.6) * \$5,000 = \$3,000$

TRC costs are: $[\$100 + \$1,500] + (.6)*(\$3,000 - \$1,500 - \$1,000) = \$1,900$

TRC net benefit becomes: $\$3,000 - \$1,900 = \$1,100$

TRC ratio changes to: 1.58

The difference between the calculations is that in the in both Examples 2a and 2b some amount of free-rider costs remain as TRC costs. From the logic of D. 06-06-63, this is because ratepayers are paying those costs, even though all customers would experience those costs whether or not there is a program. Thus in case 2a and 2b, the resulting TRC is not a pure economic test of the program, but instead an indication of the amount of ratepayer costs due to the program.

The Commission should clarify the theoretical basis for including or excluding financial incentives from TRC costs calculations. The Commission should further clarify whether it wants incentive payments made to free riders included in the TRC calculation or not, regardless of whether the payments occur directly to participants or indirectly through other participant cost decreases.

2. The Ruling's Treatment of Direct Install Costs Needs Further Clarification

The Ruling also requires that direct install costs paid by the PA be included in the TRC administrative costs, even though the payments simply cover the costs that the participants would pay to install the energy efficiency measures. The ruling does not link this directive to how this relates to resource costs, which generally have been included through the inclusion of participant or incremental measure costs. Thus on its face, the Ruling leads to the inclusion of both financial and resource costs. This “double counting” of costs artificially reduces the TRC of direct install (DI) programs. Even when this is accounted for, the obvious cost offset can lead to the inclusion of the resource costs incurred by free-riders, which would be incurred without the program.⁴ As a result, the TRC test includes more costs than the resource costs of all customers and becomes more an indicator of amount of distribution of costs paid by ratepayers.

The basic issue seems to be, is a transaction a cost because of who pays it or because of what it represents. Based on the Commission's own interpretations of the benefit costs until D. 06-06-063, the determining factor was what the transaction represented. In the SPM's simple “utility-participant” model, the participants' costs, over and above the base cost of the non-efficient measure, captured the resource cost of the measure.⁵ To ensure costs to participants and non-participants which occurred only because of the program (no free-rider costs) were treated properly, the NTG was applied to these participants' costs.⁶ From this perspective, when other delivery agents are involved in the program (e.g., third parties, upstream vendors) the need is functionally the same: to identify and include in the TRC the resource costs of the program, “no matter who pays them.”⁷

On the other hand, if who makes the payment determines when a transaction is a cost, if all transactions must be attributed only to program administrators or participants,

⁴ In case of early replacement costs, where participant costs include incremental and base efficiency measures' costs, the free-rider cost for base efficiency measures might also be included

⁵ See D. 06-06-063, page 61, footnote 60, and the references there cited.

⁶ See ALJ Ruling dated December 21, 2006, Attachment 2.

⁷ “California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects, CPUC, October 2001 (emphasis added).

and if only participant costs can be modified by a NTG ratio, the Commission's Decisions notwithstanding, then for certain programs (e.g., direct install or third party programs), the TRC denominator will include the costs which would be born by free-riders in the absence of the program.

Example from D.06-06-063

The ALJ Ruling, Attachment 1, pages 3 and 4, refers to a passage in D.06-06-063 as an example to support the conclusion that all costs are to be included in the TRC test. Three examples are provided, but D. 06-06-063 never states whether the cost inputs are net or gross. The first example is in the context of a standard SPM program administrator – utility traditional rebate program. The example is the following:

Resource benefits:	\$3,000
Participant cost:	\$2,000
Program Admin. Cost:	\$ 100
Cash Rebate:	\$1,000

Not described, but from the Commission's previous decisions, the resource benefits should be understood to be net, and the participants' cost would also be net (see footnotes 3, 4) being the additional costs of participants who are not free riders.

Results: Net benefit: $\$3,000 - \$2,100 = \$900$

The Commission states, "However, the manner in which the program is delivered or the rebate is provided to the customer should not result in different cost-effectiveness results, except in the very limited instances discussed below." D. 06-06-063, pages 68-69.

The Commission continues with a second example which is not a traditional rebate program but an early replacement, direct install program. In this example, the same data as above is presented and the \$1,000 rebate described as passing from the direct installers through to the participants. The relevant question is whether the \$2,000 participant cost in the second example is also net of free-riders? If so, costs not attributable to the program are excluded. If this cost has changed to gross, then costs not attributable to the program are included, and the test no longer indicates net resource usage.

The final example is also presented as an early replacement, direct install program in which no rebate is paid. The \$2,000 amount, now characterized as an installation cost, is paid by the administrator to the direct install contractor, and is to be included in administrator costs. The TRC net benefit and ratio are the same as in the two previous examples. In this example, is this \$2,000 cost net or gross? If the Commission means to include the resource costs of the installed measures attributable to the program, that figure, consistent with the treatment in the first and second examples, would be net. If this is the case, then the TRC net benefits and TRC ratios for the three examples are the same and computed from the same perspective.

After these examples, the Commission states (D.06-06-063, page 72), “Again, the TRC test reflects *all* participant and non-participant costs, meaning that the full resource costs of the energy efficiency investment must show up somewhere in the TRC cost-side of the equation with the limited exception of transfers of dollar benefits (rebates/monthly bill credits) to participants.” By this, does the Commission mean that the resource costs incurred by, or on behalf of, free-riders in the third example should be included in the denominator of the TRC as part of “all costs”? Then the \$2,000 figure could be gross. But this is inconsistent with the treatment of that same figure in the first, and perhaps second, example (and contradicts at least 14 years of Commission practice). The Commission should clarify whether if all direct install payments by ratepayers are to be included in PA costs, should the resource costs incurred by, or on behalf of, free-rider costs, be excluded or included?

PG&E Direct Install “Reclassification”

The ALJ Ruling’s discussion of direct install costs also infers that PG&E has “reclassified” direct install measure costs as participant costs for the purpose of applying the net-to-gross ratio (NTG) in the TRC equation. The ALJ Ruling is incorrect in characterizing PG&E’s treatment of direct install costs as a change. PG&E’s position on and treatment of direct install costs has been consistent since the direct install program calculations were performed as directed by Energy Division for the 2004-2005 program cycle. This perspective has its origins in the Commission’s decisions on the inclusion of

energy service company (ESCO) costs in the Demand-Side Management bidding pilots in I. 91-08-002/R. 91-08-003.

PG&E has implemented the TRC calculations by following the Energy Division's 2005/2004 workbook (ED workbook) which calculates the denominator of the TRC test by using a net incremental measure cost in the TRC cost calculation.⁸ For the ED workbook, direct install costs are combined with other incentives and treated as incentives in the TRC cost calculation. At the same time, PG&E also has treated the direct install costs as "incremental measure costs" in the ED workbook formula. Since incentives are subtracted from the PA budget in the ED workbook formula, the direct install costs remain in the formula as incremental measure costs. However, since the ED formula applies the NTG multiplier to incremental measure costs, the direct install costs have been appropriately netted under the ED workbook implementation of the TRC test.⁹

Furthermore, applying NTG to the direct install costs is necessary for the TRC test to capture the resource cost to all ratepayers of the energy efficiency program. Costs that would have been spent to install the energy efficiency measures absent the program should be excluded from a test of the program's impact on society's total resources, just as the benefits that would have been produced absent the program should also be netted out.¹⁰

The Commission first faced the challenge of expanding the "utility-participant" model used in the SPM when it considered Demand-Side Management bidding in the early 1990's. In some respects, the third-party and partnership selection processes recently concluded are the direct descendents of those early activities. The framework

⁸ "Energy Efficiency Groupware Application Program Report Workbook" for program year 2005, Tab 2, cell R10 "total net incremental measure cost". The ED Workbook has provided the basis for incorporating the SPM test calculations into the E3 calculator.

⁹ If direct install costs are added back into the administrator costs under the ALJ ruling and also remain in the incremental measure or participants cost factor, there will be double counting of the direct install costs in the denominator of the TRC formula. There also is a similar potential for double counting costs with upstream/mid-stream payments. Since those payments buy down the retail price of energy efficiency measures, they are covering part of the incremental measure cost for the participant. Consequently, if the upstream/midstream payments are added to the administrator costs without any reduction in the participant costs, there could be a double counting of costs in the denominator of the TRC formula.

¹⁰ While the "missing page" included in the Ruling is dated October 7, 1988, the Commission has implicitly included this in the TRC since at least 1992. See D. 92-09-080, page 60, footnote 40.

established during that proceeding guided subsequent benefit-cost evaluation of non-utility energy efficiency providers. In D. 92-09-080, page 69, the Commission asked, "...that respondents and interested parties address the issue of whether the NTG ratio should be applied to total resource calculation for these bidding pilots, and if so, how." After receiving comments, it decided, "For the reasons stated above, we adopt SDG&E's proposed approach to applying the NTG ratio to the cost side of replacement bid [bids replacing utility programs] proposals in SDG&E's, SoCal's and SCE's pilot [bidding] programs. Specifically, SDG&E, SCE and SoCal should require bidders to break down their bids into two components: 'customer incentives/rebates' and 'other costs.' The NTG ratios adopted in D. 92-09-080 shall be applied to the customer incentive/rebates component and to the estimates of customer contributions." (D. 92-12-050, page 6) Further, it found "For PG&E's partnership bid pilot, however, we will permit PG&E to use the approach presented in its May 21, 1992 compliance filing, which applies the NTG ratio to bidder payments and customer contributions." (D. 92-12-050, page 6) In all cases, the Commission chose to apply a NTG ratio to more costs than just participants' costs, and, in PG&E's case, the NTG ratio was applied to all bidder payments.

Thus, PG&E has not changed its treatment or characterization of direct install costs. The ALJ Ruling's requirement to include direct install costs in administrative costs and to exclude them from incentives and participants costs with no NTG adjustment creates historical inconsistencies with the treatment of them as late as with the 2005 ED workbook formula, as well as with D.05-04-051, and as early as 1992.

3. Net to Gross Issues

Described above are examples of how the Ruling's inclusion of transaction as PA costs in the TRC test, even when these costs are offset, results in free-rider costs entering the TRC. If the TRC were to be a pure test of the impact of a program on resources, the Commission would provide that these costs be excluded as costs from the TRC no matter what its treatment of other costs. Further, the specific examples in the tables below show that lower NTG ratios magnify this effect. If the Commission does nothing else, it should directly address the question of whether it wants free-rider resource costs included in the TRC or not.

Quantitative Effects on Portfolio are Potentially Significant

The ALJ Ruling has very troubling impacts and ramifications for each IOU's energy efficiency portfolio. For example, as a result of the changes ordered in the ALJ Ruling, PG&E estimates its 2006-2008 overall portfolio net TRC value drops from 1.61 to 1.42 (or 1.57, if cost offsets are included). The impact is more striking when activities and contracts within the portfolio are examined. As shown in the appendix to this Attachment, PG&E estimates several of its program activities no longer have TRC ratios above 1.0. What is most troubling, however, is the fact that the ALJ Ruling will push program administrators to favor older style rebate programs that are less effective at achieving energy efficiency savings than the newer, innovative programs created in recent years, many by non-utility providers.

This latter result will occur because the ALJ Ruling ensures that the only programs with unchanged TRC test results are the old-style rebate programs where the participant paid all the costs out of his or her pocket and obtained a rebate directly from the PA. Other types of incentives or financial support for customer energy efficiency are not recognized as and treated as incentives. This will distort the TRC for non-rebate programs as described above. Also, the participants' or incremental measure costs will now be subject to different calculations depending on who writes the check to the installer¹¹. This introduces a second distorting impact if the TRC is still meant to measure society's overall resource cost for the program.

As a result, new, innovative energy efficiency programs, which may be both more effective at achieving energy savings and more cost-effective, are disfavored as compared to the rebate programs that date back to the 1980's. The newer programs are more effective precisely because the PA payments directly to the suppliers in the supply chain or to the installers are more attractive for customers than requiring the customers to pay full price and later get a rebate from the PA.

¹¹ Consider activities designed to encourage proper charge and air flow for residential customers with air conditioners. If the PA pays the vendor, the payment is a cost. If the PA pays the customer who pays the vendor, it is a rebate excludable from the TRC producing higher TRC results. But the former is the more efficient and effective program design.

In the appendix are TRCs for a number of energy efficiency activities and for PG&E's portfolio as a whole. Table 1 presents TRCs using the information underlying PG&E's most recent Compliance Filing¹² or, in the case of third-parties or local government partnerships, the most recent agreement. Because PG&E's core programs are often defined over a wide range of activities, these "core" activity estimates are based on a representative measure included in that activity. The Appendix presents TRC calculations consistent with those originally filed, and then under the two interpretations of D. 06-06-063 presented earlier. That Decision and the ALJ letter of December 21, 2006, do not specify whether the costs to be included as program administrator cost can be offset by reductions of the other (participant) costs (cost-offsets). TRCs are presented both without such cost offsets. When cost-offsets are included, the participant or incremental measure costs (whatever was included in the original calculation) are reduced a \$1 for each \$1 included as a PA cost. The TRC's of all non-direct rebate programs are lower.

In addition, because the "new" approach to calculating TRC's makes the results dependent on the value of the net-to-gross (NTG) ratios' used, PG&E conducted a scenario analysis with all NTG ratios reduced about 20% from the original values. This was done to show that if lower NTG ratios are found in Energy Division's future evaluation studies TRC values will be lower. As can be seen by comparing table 1 and table 2, lower NTG ratios seem to accentuate the drop in TRC's.

Similar effects can be expected in SCE, SDG&E and SCG's portfolios.

In other words, since the TRC calculations under the ALJ Ruling are geared to the way older programs worked, the ALJ Ruling will disadvantage newer, more effective programs because the improved cost effectiveness of these newer programs will not be recognized. The result will cause the utilities to pursue less effective programs, reduce the amount of cost-effective energy efficiency California can pursue, and undermine the

¹² Advice 2704-G-A/2786-E-A filed April 17, 2006.

role of energy efficiency in California's Energy Action Plan.¹³ For these reasons, the ALJ ruling is not consistent with good public policy.

The Impact on Energy Efficiency Potential May also Be Significant

Because the Commission's current approach includes more costs in the TRC than formerly, the economic potential available for capture by future energy efficiency plans is smaller. A critical step in potential studies is to assess the portion of technical potential that is "economic." This is typically done by applying a cost-effectiveness test to the savings technically feasible by replacing all measures with the most efficient technology available. Future potential studies should capture the increase in TRC costs inherent in the Commission's current approach to TRC costing. This would be a test with higher costs than used in the past. This could have the effect of reducing the level of technical potential found to be economic and available to be realized in future programs.

There is a risk to the Commission if these effects on potential are not captured in future goal setting. The potential underlying future goal setting could be set using a TRC screen which does not recognize the additional costs now included in the TRC. This will make it more difficult to devise program which pass the TRC (with the higher costs included) and achieve the goals. The Commission should avoid this risk by ensuring that the potential underlying future goal setting is consistent with its direction on including costs in the TRC.

Other Interpretations of 2001 California SPM Reach Conclusions Different from the 12/21 Ruling and D. 06-6-063.

The Ontario Energy Board (OEB) in Canadian Province of Ontario has recently developed a framework for energy efficiency TRC analysis starting from the 2001

¹³ The current energy efficiency targets were set using historical energy savings and cost effectiveness data. This data reflected accomplishments achieved under the array of programs available including upstream/midstream programs, direct install and the point-of-purchase (POP) *programs*. PG&E could not achieve the same levels of effectiveness under the ALJ Ruling's approach to computing TRC, with the consequence of reducing our ability to achieve the goals. In addition, the ALJ Ruling makes the basis for PG&E's energy efficiency shareholder incentive proposal in phase 1 of R.06-04-010 no longer accurate. In order to avoid unintended consequences in that case, the Commission needs to have accurate values which, in turn, will depend on incorporating the effect of the ALJ Ruling on the data.

California SPM. But it reaches very different conclusions on the treatment of rebate or incentive costs than the interpretation now in place in California. Its current “Total Resource Cost Test Guide” (TRC Guide) was published October 2, 2006 after public comment, and can be found at: www.oeb.gov.on.ca/documents/cases/RP-2004-0203/cdm_trcguide_021006.pdf. While the structure of the electric industry in Ontario differs from California¹⁴, the OEB’s treatment in the TRC of rebates paid by entities other than the LDC (local distribution company) is of special interest. The TRC Guide states, “Third Party Rebates – This variable refers to any dollar discounts or rebates offered to the customer by any other party other than the LDC (i.e. government or manufacturer for the purchase of an energy efficiency technology. Third party rebates are not considered in the Total Resource Cost Test, as it is considered a benefit to the customer and cost to the third party, and therefore cancel each other out.” (TRC Guide, Appendix A, page iii)

Ontario’s TRC Guide also explicitly treats the costs incurred by free-riders in a manner different from the December 12, 2006 Ruling. The TRC Guide states, “In determining overall savings, these participants are excluded from the benefits attributed to the program. The equipment costs associated with these participants is similarly excluded from cost side of the equation.” However, it should be noted that all (LDE) program costs associated with free riders must be included in the analysis.” (TRC Guide, page 15). Program costs are defined earlier (TRC Guide, page 11) as exactly the LDC’s program development and startup, promotion, its own equipment and installation, monitoring and evaluation; and administration costs¹⁵.

Conclusion and Recommendations

For the reasons described above, implementation of the ALJ Ruling will inhibit the existing and future energy efficiency programs, the state’s ability to pursue and obtain the maximum amount of cost-effective energy efficiency, and the potential to develop

¹⁴ In Ontario electricity delivery is accomplished through local distribution companies (LDCs).

¹⁵ Another attempt to explicitly extend the SPM two agent (utility-participant) framework was published in 1994. See Fulmer, Mark and Bruce Biewald, “Misconceptions, Mistakes, and Misnomers in DSM Cost Effectiveness Analysis” Proceedings of the ACEEE 1994 Summer Study on Energy Efficiency in Buildings, ACEEE, 1994, pages 7.73-7.83 especially the section on TRC starting on page 7.78.

new, innovative, more effective programs for energy efficiency. To prevent the adverse, unintended consequences of the ALJ Ruling on the state's energy efficiency efforts, it is recommended that the ALJ Ruling should be suspended so the Commission, its staff, the utilities, and other interested parties can investigate and definitively determine what the TRC test should be measuring and how to keep the TRC test current with new developments in the delivery channels and programs for achieving energy efficiency. This work could occur in workshops which should include participation by outside economic experts in the energy efficiency field. In order to give the utilities and other program participants such as third parties and local government partnerships time to incorporate the results of this work, the utilities' implementation of the TRC test prior to the ALJ Ruling should be left in place for the 2006-2008 energy efficiency program cycle. Any new method for implementing the TRC test should start with the program cycle beginning in 2009.

Appendix to Attachment 1

As displayed in the examples drawn from PG&E's programs shown below, the results of the Commission's current approach appear to be sensitive to a program's NTG ratio. This may be because the full amount of certain costs are now included as PA costs. Two TRC's are shown. The first shows the TRC with no cost offsets (i.e. participant costs are not reduced by the amount of costs included as PA costs) and the second with cost offsets (i.e. participant costs are reduced by the amount of PA costs included).

Table 1
Comparison of Activity and Portfolio TRCs

Program	TRC as Filed: April Compliance/final contract	TRC under Commission's new approach without cost offsets	TRC under Commission's new approach with cost offsets
Heshong-Mahone Group – Cal. New Homes Multifamily Program*	1.22	0.74	1.02
Ecology Action – RightLights Program*	1.18	0.93	1.1
Synergy – Comprehensive Manufactured/Mobil Home Program*	1.34	0.74	1.14
Proctor Engineering – Fan Time Delay Program*	1.33	0.67	1.07
Cal-Ucons – Commercial Laundry Program	1.14	0.93	0.99
LGP – SF Weather Stripping	1.21	0.64	1.02
Core-Refrigerant Charge & Airflow	1.58	0.51	0.75
Core-Direct Install	1.11	0.76	0.92
Core-Duct Test and Seal	0.63	0.40	0.62
Core-Refrigerator Recycling	1.30	1.08	1.20

*TRC based on signed contract and September 2006 specifications.

The NTG ratios used during program development in 2005-2006 were based on the best available information at the time, still there is the chance that when the impact studies on the 2006-2008 programs are completed, program NTG ratios will be found to be lower. To provide an insight into the impact that might have under the Commission's current approach to TRC calculations, the TRC of the specific activities/programs above was recomputed using a NTG 20% lower, i.e., if the NTG of a program in Table 1 was 80%, then in Table 2 a NTG of 64% was used for that program in calculating the TRCs below.¹⁶

¹⁶ The E3 calculator used for the April 2006 Compliance Advice filing does not allow user-specified NTG ratios. If the exact ratio was not available the closest available was used. For example, if the original NTG was 0.8, 80% of that ratio, or .64, might not be available. In that case, the closest ratio, .62, was used. This rarely amounted to a change of more than .02 or .03 in the ratio

Table 2
Comparison of Activity and Portfolio TRCs under Alternate Net-to-Gross Ratios
(down 20%)

Program	TRC as Filed with alternate NTG	TRC under December 12, 2006 Ruling	TRC under December 12, 2006 Ruling with cost offsets and alternate NTG
Heshong-Mahone Group – Cal. New Homes Multifamily Program*	1.12	0.65	0.87
Ecology Action – RightLights Program*	1.02	0.8	0.91
Synergy – Comprehensive Manufactured/Mobil Home Program*	1.23	0.64	0.91
Proctor Engineering – Fan Time Delay Program*	1.24	0.58	0.86
Cal-Ucons – Commercial Laundry Program	1.04	0.83	0.91
SF-Weather Stripping	1.21	0.56	0.84
Core-Refrigerant Charge & Airflow	1.58	0.47	0.67
Core-Direct Install	1.11	0.71	0.84
Core-Duct Test and Seal	0.63	0.36	0.54
Core-Refrigerator Recycling	1.30	1.04	1.15

CERTIFICATE OF SERVICE BY ELECTRONIC OR FIRST CLASS MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, California 94105.

On the 31st day of May 2007, I served a true copy of:

**JOINT PETITION OF PACIFIC GAS AND ELECTRIC COMPANY, SAN
DIEGO GAS & ELECTRIC COMPANY, AND SOUTHERN CALIFORNIA EDISON
COMPANY FOR MODIFICATION OF DECISION 06-06-063**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for R.04-04-025 and R.06-04-010.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for R.04-04-025 and R.06-04-010 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 31st day of May 2007 at San Francisco, California.

/s/

PAMELA TOM

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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Commissioner Assigned: Michael R. Peevey on December 20, 2005; ALJ Assigned: Julie Halligan on April 28, 2004

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